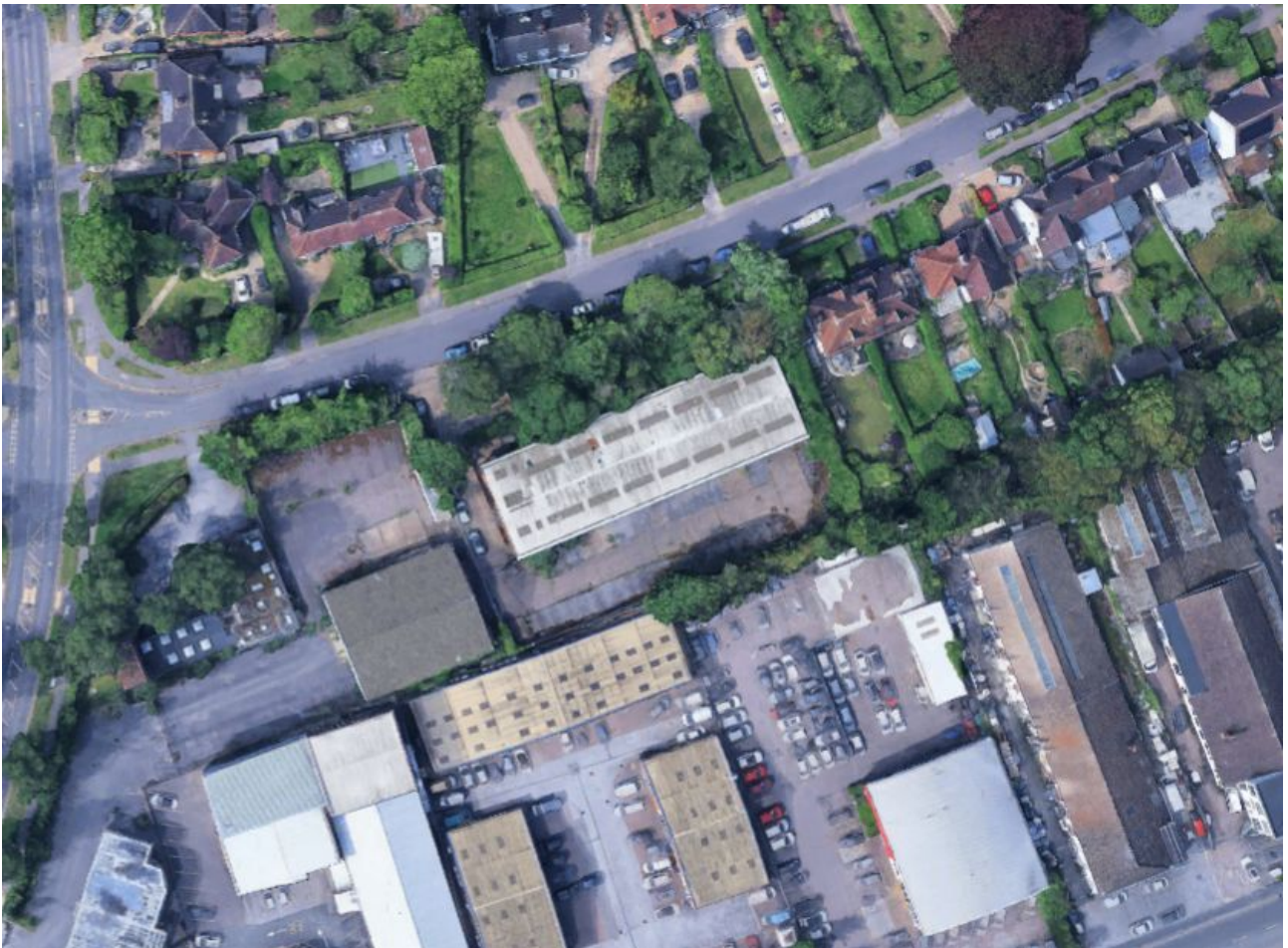


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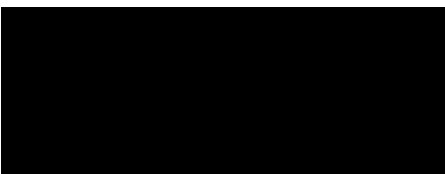


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REMEDIATION STRATEGY REPORT

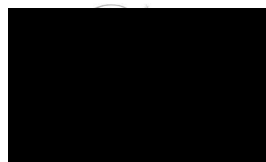


Report Prepared By:



Steven Partridge

Report Reviewed By:



Alex Akeroyd

Client: Wheatley PLC

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Attachments:

Attachment One: Notice to Interested Parties

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1 Introduction

1.1 Site Description and Introduction

The site is located on Glebe Road in Letchworth Garden City and comprises a single light industrial building, divided into separate commercial units, with a parking area to the rear and single access road from Glebe Road. We understand that Wheatley PLC (our client) proposes to redevelop the site for future residential use, with 9No. 3 bedroom houses in the location of the existing building with garden areas to the north and communal parking to the south.

In advance of submitting a planning application for the site redevelopment, we undertook a series of environmental assessments, including a desk study appraisal and an intrusive borehole investigation, to assess the extent and severity of potential contamination present at the site. The results of our environmental assessment indicated that concentrations of contaminants of concern in samples from the shallow Made Ground posed a potential risk to future site residents.

We recommended that a remedial strategy be devised for the site, once the final redevelopment scheme had been confirmed and details of proposed building / garden locations were finalised.

Our previous environmental assessments were submitted to North Hertfordshire District Council, in support of a planning application for the site's redevelopment. Condition Eight and Nine of the decision notice (Planning Application Ref: 25/01871/FP) requires the provision of a remediation strategy for the site and the provision of a validation report to demonstrate the remedial strategy has been effectively implemented.

This report provides a remedial strategy for the site, detailing the remediation works and validation sampling that we consider to be necessary to address the identified contamination and mitigate the risk posed to future site residents.

Your attention is drawn to the Notice to Interested Parties included as Attachment One.

1.2 Scope of this Report

This report is designed to set out our remedial strategy for the site and provides the following:

- Presentation of a summary of relevant environmental data;
- Define key remedial objectives and determine the most appropriate remedial solution for the site;
- Provide descriptions of proposed remedial techniques, volumes, program of works and assign of key roles and responsibilities;
- Details of verification works that will be undertaken to confirm that the remedial works have been successful and all key remedial objectives have been met;
- Identification of potential contingency measures that could be implemented if, subject to the completion of the remedial works specified within our primary strategy, further works are considered necessary.

All our activities were carried out in accordance with the procedures set out in our Quality Manual.

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1.3 Previous Reports Relating to the Site

As part of our environmental assessment we have reviewed the reports listed in the following table.

Our Ref.	Report Title	Prepared By	Prepared on Behalf of	Date of Issue	Report Reference
Ref.1	Environmental Investigation Report	Subadra Consulting Ltd	Letchworth Garden City Heritage Foundation	September 2017	IN17568 CL 001
Ref.2	Phase One Environmental Assessment Report		Wheatley PLC	June 2025	IN24057 CL 001

We have used information from these documents, where relevant, in other sections of this report.

Table One: Previous Environmental Reports Relating to the Site

1.4 Proposed Development Plans

Proposed Developments

We understand that Wheatley PLC (our client) proposes to redevelop the site for future residential use, with nine three-bedroom houses in the location of the existing buildings, with garden areas to the north and communal parking to the south. A site plan showing the proposed development plan is provided on below.



Table Two: Proposed Development Plans

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2 Review of Previous Site Data

2.1 Review of Desk-based information (Ref.2)

Item	Data
Site Description	The site comprises a single story brick built light industrial building that has been divided into separate commercial units. There is a small area of landscaping in front of the building, off Glebe Road, and an associated car parking area to the rear of the building with an access road leading from Glebe Road along the western site boundary.
Site Location	The site is located on Glebe Road in Letchworth Garden City, towards the north western end of an industrial estate and to the north of the town centre.
Geology and Hydrogeology	Drift No drift deposits shown on BGS mapping.
	Solid Holywell Nodular Chalk Formation, described as chalk and classified by the Environment Agency as a Principal Aquifer.
Hydrology	A shallow land drain is located 140m west.
Water Abstractions	The site lies within a Source Protection Zone (Zone II), associated with the underlying Chalk Principal Aquifer, but no abstractions have been identified within 1km.
Site history	The site appears to have been first developed as a warehouse building during the 1970s. This comprises the existing site building, which is now divided into various small light industrial units.
Flood Risk Zone	An area where flooding from rivers and the sea is very unlikely. There is less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year.
Radon Risk	The site is located in an area where the National Radiological Protection Board have determined that <1% houses exceed the recommended Action Level for radon for existing homes in the UK of 200Bqm⁻³ (averaged over a year). The site is therefore in an area of low radon risk and no radon protective measures are necessary in the construction of new houses.
Landfills	Whilst we have identified potential sources of ground-gases, we have concluded that the likelihood that significant ground-gas concentrations and flow rates are present, is very low. We therefore consider that the the site is unlikely to be at-risk of impact from concentrations of hazardous ground gases, and no further monitoring or assessment is required.

Table Three: Summary of Site Sensitivity

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Figure One: Site Location Map

Direction	Details
North	Glebe Road (~10m) with residential properties beyond (>20m).
East	Residential properties with gardens (adjacent).
South	Commercial properties including former factories and engineering works (>10m).
West	Car repair workshop and dealership (>10m) followed by Norton Way (~50m) and residential properties.

Table Four: Surrounding Land Use

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Figure Two: Aerial Photograph Showing Site Setting

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2.2 Review of Environmental Investigation Data (Ref.1)

2.2.1 Geology and Hydrogeology

Item	Data
Geology	Our site investigation confirmed that underlying geology comprises a variable thickness of Made Ground encountered to between 1.1m and 2.6m depth (possibly thickening toward the south western corner of the site). The Made Ground comprised a heterogeneous mixture of predominantly sandy gravel with varying amounts of brick, gravel and flint and some tarmac fragments were noted. The Made Ground was underlain by chalk (Holywell Nodular Chalk Formation), which was present to our maximum borehole depth of 5.0m.
Depth to Groundwater	We did not encounter any groundwater during our investigation. We advanced a dynamic probe to 8m depth in the location of BH1 and no groundwater was encountered at the base of this probe hole, nor within the remaining boreholes.

Table Five: Summary of Investigation Results

2.2.2 Summary of Contaminants of Concern, Concentrations and Distribution

Based on a review of the chemical analysis data and subsequent quantitative risk assessment carried out as part of the recent ground investigation, the contaminants that exceeded relevant risk-based screening criteria are summarised in the following table.

Sample Matrix	Contaminant of Concern	Details			
		Concentration (mg/kg)	Location*	Unit	Depth (m)
Soil	Arsenic	33	BH1	Made Ground	0.6
	Benzo[a]pyrene	2.92	HP1	Made Ground	0.6
		2.46	BH4	Made Ground	0.3
	Benzo[b]fluoranthene	3.46	HP1	Made Ground	0.6
	Asbestos	Bundle of Crocidolite fibres	BH1	Made Ground	0.6
		Bundle of Chrysotile fibres	BH5	Made Ground	0.4
Groundwater	Not applicable - no impact of underlying chalk soils encountered, suggesting the low concentrations of PAHs have not leached from shallow Made Ground. No further assessment required.				
Ground gas / vapours	Not applicable - desk based hazardous ground gas assessment indicates no further assessment required.				

Notes: * - Site plan showing borehole locations provided below

Table Six: Potential Contaminants of Concern

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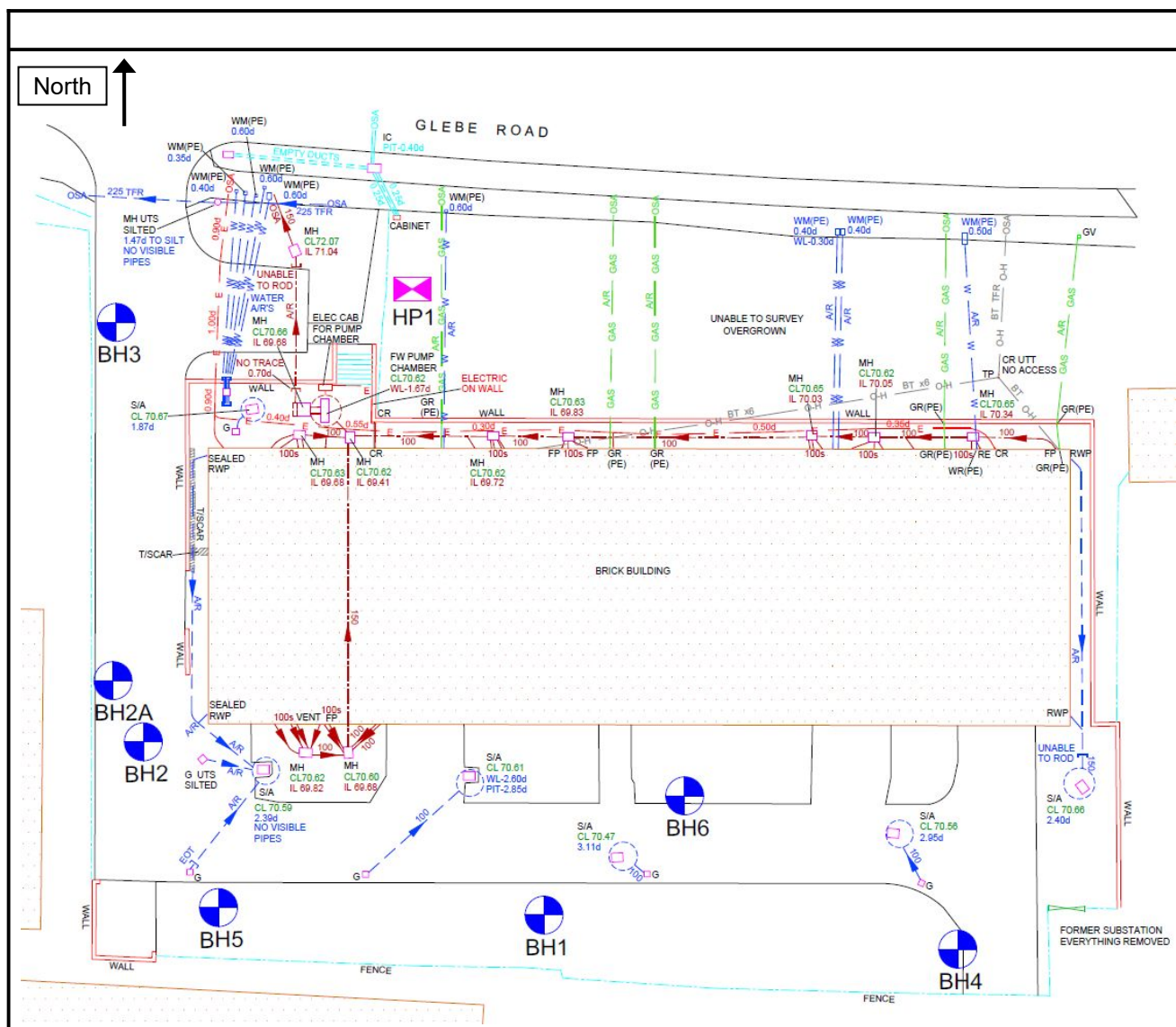


Figure Three: Borehole Location Plan (Ref.1)

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Source	Receptor	Pollutant Linkage Assessed	Viable Linkage Requiring Remedial Works
Contaminants in shallow soil (PAH, arsenic and asbestos fibres)	Future Residents	Dermal contact and/or ingestion	Yes - risk to future site residents in garden areas.
	Future Residents	Inhalation of hydrocarbon vapours in indoor air	No - contaminants identified (and the concentrations recorded) do not pose a significant risk of volatilisation to indoor/outdoor air.
	Future Residents	Inhalation of hydrocarbon vapours in outdoor air	
Hydrocarbons in groundwater	Future Residents	Inhalation of hydrocarbon vapours (in/outdoor)	No risk/linkage identified.
	Off-site residents		No risk/linkage identified.
	Groundwater Resource	Impact on groundwater quality	No risk/linkage identified.

Table Seven: Summary of Viable Linkages

3 Remediation Strategy

3.1 Specific Remedial Objectives

Our primary remedial objective is to carry out the necessary remedial works and/or ensure appropriate engineering controls are implemented as part of the redevelopment, to ensure that any critical pollutant linkages are broken, whereby all potential risks to future site users and any associated controlled water receptors, are mitigated.

Our secondary objective is to provide site data sufficient to verify the above objective has been completed, which in turn should permit the discharge of any contaminated land conditions that may be specified within the Local Planning Authority decision notice and/or satisfy NHBC requirements (or equivalent building warranty provider).

3.2 Strategy Overview

Based on the concentrations and distribution of the various contaminants of concern, we do not consider active remediation will be required for the site. However, engineering controls that should be implemented during construction, such as a capping layer for landscaped areas, to mitigate risk to site users.

3.3 Engineering Control Measures

The engineering control measures that we have recommended to mitigate the risk to future site residents are presented in the following table.

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3.3.1 Soil Cover System

A layer of sub-soil and topsoil dressing (i.e/ soil cover system) should be applied to all residential gardens/plots.

The thickness of soil cover required needs to fulfil two requirements. Firstly, it needs to provide a barrier between any residual contaminants that are present within the underlying soils. In this respect the thickness of total cover required is predominantly dependent upon the contaminant concentration present in both the underlying soil within that area and that of the cover material. Based on the absence of asbestos quantification data, we have assumed that asbestos fibre concentrations exceed 0.001% for the purpose of this strategy.

Secondly, the thickness of top soil should be sufficient to sustain the proposed plant growth, as specified by a horticulturalist. Note, we have assumed no cultivation will occur in soft landscaped areas and if growth of fruit or vegetables is undertaken at the site, this will be in raised beds, filled with clean imported soil.

Based on the available data we propose that the following soil cover system be adopted:

Layer	Depth of Layer (from surface)	Details
Topsoil	0-100mm	Given the nature of the existing site layout, topsoil and sub-soils are likely to be imported.
Sub-soil	100-600mm	
“No Dig” Geo-textile membrane	600mm	Deployed to separate any residual contamination present from mixing with the clean imported soils, and to act as a visible warning to future site residents.
Note	Where Made Ground is present, it should be graded/removed to adequate depths, with respect to final site levels, to enable the proposed cover system to be installed as specified above.	

Note: It might be possible to reduce the required thickness of the cover system once quality data of imported topsoil has been provided

Table Eight: Design of Surface Soil Cover System

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We provide the following additional notes on the proposed engineering controls.

Item	Details
Protection of construction workers	Construction and maintenance workers, particularly those working on below ground utilities, should be made aware of the hydrocarbon concentrations encountered in soil. Strict hygiene practices should be followed during any below ground works. To minimise potential exposure of workers to potential hydrocarbon contaminants, site clothing should be removed after each working period. A clean area should be made available with washing facilities for use after each shift. Changing and washing areas should be positioned to ensure that no field equipment enters the clean area. Eating, drinking and smoking should be restricted to the clean area.
Waste Classification	Classification should be carried out using the characterisation assessment and analysis described within the Environment Agency's technical guidance 'Waste Classification (WM3, 1st edition 2015). The analysis we carried out as part of our ground investigation can be used to assist in this process, but there likely to be other criteria that need to be met under their permit. All waste soils and fill materials must be disposed of at an appropriately licensed disposal site. A registered waste haulage contractor must transport all waste soils. It is the responsibility of the site owner to ensure that wastes are safely transported and disposed of correctly. As with any brownfield site, areas of soil with greater concentrations of hydrocarbon impact (or other potential contaminants), than recorded in the analysis completed, may be encountered during redevelopment works. This may lead to soils being generated with a higher waste classification, which in turn may lead to increased disposal costs. The segregation of contaminated/inert soils on-site can be considered as a 'pre-treatment' of waste, which is required by the Environment Agency (as specified by Landfill (England and Wales) Regulations 2002). In the majority of cases segregation is also likely to reduce waste disposal costs. If requested, we can take soil samples from any stockpile and carry out waste classification analysis in order to assist with the classification process.
Potentially Polluting Operations During Construction	The use of plant equipment on site during construction can result in the accidental release of contaminants to ground, such as fuels, oils, coolants and lubricants. To avoid such incidents all construction machines should be maintained to a safe and efficient working condition at all times and any oils or fuels stored should be contained in accordance with The Control of Pollution (Oil Storage) Regulations 2001. Although the Environment Agency's 'Working at construction and demolition sites: PPG6 Pollution Prevention Guidelines' has been withdrawn, it contains further information relating to reducing the risks of causing pollution or nuisance, for example, specific refuelling areas, full time environmental support, mains electricity, a wheel wash to prevent mud being carried out onto the road. It is good practice to decommission all existing monitoring wells prior to the redevelopment works commencing, to remove a preferential pathway to groundwater should an incident occur.

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Item	Details
Re-use of site-won material	It may be possible to re-use site won materials, such as concrete or soils, subject to certain controls and/or permitting. For example, crushed site derived demolition material can be re-used on site, subject to the contractor demonstrating that the crushed material will be generated and re-used in accordance with relevant Environmental Permits or Waste Exemptions. Given the presence of elevated contaminants of concern at various locations within the Made Ground, the Made Ground must not be reused within the proposed soil cover system. Alternatively, materials can be re-used if an appropriate Quality Protocols is adopted, such as the CL:AIRE Definition of Waste: Development Industry Code of Practice (DoW CoP) or the WRAP 'Aggregates from Inert Waste' protocol. A Material Management Plan (MMP) should be developed and maintained by the contractor throughout the works. Any reclaimed waste material that are to be reused on-site should also meet any other specifications (for example geotechnical specifications) required by the client.
Environmental Nuisance	It is the Principal Contractors responsibility to monitor and mitigate risk associated with potential environmental nuisance issues. Potential nuisance issues that could result from the development process and associated remediation works include: Noise associated with plant used during demolition, construction of foundations and remediation excavations; dust produced during excavation works and odours created during excavations and/or associated with stockpiled materials.
Unforeseen Contamination	As with any development we recommend that a watching brief be established at the site during the excavation of foundation trenches for the new buildings and above/below ground structures. If any potential contamination (staining, odours etc) of underlying soils and/or groundwater are suspected, we should be notified and verification sampling completed. The results of this verification can then be used to revise our conceptual site model and complete a suitable risk assessment to determine what, if any, further is required.

Table Nine: Additional Considerations

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4 Verification Plan

4.1 Construction Issues and Verification of Engineering Control Measures

Where applicable, photographs of engineering control measures will be taken to provide verification the Remedial Strategy has been appropriately implemented. Details of any specific information that should be obtained is highlighted in the table below.

Item	Details
Waste Disposal	A summary of the volume and waste classification of all exported material will be collated and issued. Copies of all waste consignment notes should be made available upon request.
Cover Systems Thickness	The thickness of cover (both top-soil and sub-soil) should be verified; this can be in the format of a photographic record showing test pits and measuring staff clearly showing cover thickness relative to final site levels. Photos of the base of the cover layer should also be obtained to verify the presence of any geotextile membrane and/or capillary break layer. Verification inspection frequency should be one plot in two (as per NHBC recommendations for sites with 5 to 20 plots). A site plan showing pit locations should also be included.
Quality Imported Material	If the producer is not able to provide analysis certificates, and in the absence of published guidance from the local authority, we would recommend samples should be collected for analysis, ideally prior to placement. We would recommend that a minimum of 3 samples, or 1 per 100m ³ (whichever is greater is sufficient to characterise each stream of imported material). Subject to confirmation from the Local Planning Authority/NHBC, it may be possible to demonstrate that the material is appropriate for use by using analysis data provided by the commercial supplier. This will usually be permitted provided that there is evidence that the analysis material relates directly to the material being imported; the certificates are less than two months old; the type and amount of analysis is in line with the above recommendations. Verification samples should be collected insitu and analysed one plot in two (as per NHBC recommendations for sites with 5 to 10 plots). A site plan showing test pit locations should also be included. Any soil samples collected should be submitted for our contamination chemical analysis suite, which includes: Asbestos screening, metals, speciated PAHs, speciated TPH compounds, BTEXM compounds, TOC and pH. Additionally, the contractor should be advised to carry out a visual inspection of soil on delivery in order to confirm the soil visually compares with that described on suppliers test report. The results of the analysis (supplier provided or from our on-site testing) will be compared against our Generic Assessment Criteria protective of residential end-use (with produce)

Table Ten: Verification of Engineering Controls

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4.2 Verification Report

All data produced during the construction phase of the remedial works will be issued within a Remediation Verification Report, shortly after the completion of the development.

4.3 Non-Conformance with Verification Criteria

As part of the verification phase we will review all available data and assess whether all remedial objectives have been met successfully.

However, in the unlikely event that the concentrations of soil our remediation criteria and we recommend that further works are required, we would likely consider one or a number of the following actions:

- Refinement of our Conceptual Site Model and re-assessment
- Remediation Options Appraisal and further remediation

5 Regulatory Comment

Our Detailed Remediation Strategy (this document) should be issued to the regulators for review and comment. Any comment received from the regulators should be forwarded to us for review.

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**ATTACHMENT ONE:
NOTICE TO INTERESTED PARTIES**

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NOTICE TO INTERESTED PARTIES

The purpose of our work is to provide general information on the environmental and/or geotechnical conditions existing at the site And related to soil and/or groundwater. The Client or others specified the scope of the investigation And the validity of our conclusions is limited by the scope of work specified. We are not responsible for any such limitations or omissions.

Where stated in this report, we have used information supplied by third parties. While we have evaluated As far as possible the validity Of this information, we cannot guarantee its accuracy In any way whatsoever.

No investigation technique is capable Of completely identifying all Of the contaminants that might be present In the soil or groundwater under a site. Where specified In our report, we have examined the ground by constructing a number of boreholes and/or trial pits. We recovered samples of soil and/or groundwater from available exposures.

The depth And spacing of our sampling locations were selected To ensure With a reasonable probability that they would be representative Of the actual conditions across the whole site. However, safety considerations relating to existing site infrastructure may have restricted our ability To investigate all potential contaminant sources. Specifically, we were unable To investigate the soil And groundwater condition immediately adjacent To the underground structures and/or buried services. These limitations must be borne In mind When considering the conclusions reached In this report.

Soil is intrinsically variable and the spread Of contaminants within the soil is therefore subject to a degree Of non-uniformity. For these reasons no sampling technique can completely eliminate the possibility of obtaining samples that are not representative Of the actual conditions. Our sampling techniques are intended To reduce the possibility to an acceptable level, within the limits imposed by the budget and scope of the investigation.

Groundwater levels and soil vapour levels that we report were accurate at the time of the investigation. Groundwater And soil vapour levels are variable. Long term monitoring may be required to ensure that the levels recorded during our investigation are representative of long term and possible 'worst case' conditions. In accepting our recommendations and/or conclusions the Client acknowledges that further, more detailed investigation could allow a more accurate assessment of site conditions to be made and that this would reduce any consequential risk to the Client.

Our investigation was carried out to assess the significance of contamination resulting from use of the site as identified in this report. Unless we have indicated otherwise, no assessment of the potential impact of any other previous uses has been made. No investigation was carried out to determine whether or not any deleterious or hazardous materials (such as asbestos) have been used in the construction of the buildings present on the site. Unless otherwise stated no investigation or assessment has been made of the presence or otherwise of invasive plant species including but not limited to Japanese Knotweed.

Unless specifically stated otherwise, we have not assessed the effect of any proposed future construction activities on existing structures on or near to the site. Nor, unless stated otherwise, have we assessed the likely effect of trees on existing or proposed structures on or near the site.

We do not accept any responsibility for the cost of remedial works or other costs incurred in whatever way whatsoever as a result of any omissions, errors or other shortcomings in this report unless we have been given reasonable opportunity to verify ourselves that such faults exist and we have been given a reasonable opportunity to carry out works to remedy such faults ourselves using the most practicable means available to us. We do not accept liability for any consequential losses incurred by you while either we or others carry out any remedial works we deem necessary.

This report has been prepared for the Client, as specified on the cover page of this report. We do not accept any liability whatsoever to any other third parties unless explicitly agreed by us in writing. In accepting our recommendations and/or conclusions the Client accepts that the terms of our appointment were as detailed in the Proposal, or Proposals, that we provided to the Client before being appointed and that these terms supersede and have precedence over any other terms and/or conditions set out in any contracts agreed between ourselves and the Client, regardless of when such terms and/or conditions were agreed to by us and/or signed by us even if such contracts contain terms that contradict this.

Neither the whole nor any part of this report, or any reference to it, may be included in any published document circular or statement or published in any way without our prior written approval.

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